



# Customer Privacy Notice

**Contact details.**

Creditor: Kroo Bank Limited.

Address: LABS House, 15-19 Bloomsbury Way, London, WC1A 2TH.

E-mail address: [help@kroo.com](mailto:help@kroo.com).

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## **Introduction**

Kroo Bank Ltd ("**we**", "**us**", and "**ours**" or "**Kroo**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information please contact us using the contact details provided at the end of this Privacy Notice.

## **What does Kroo do?**

Kroo is a company incorporated in England and Wales. It is authorised as a bank by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority (firm registration number 953772). At present Kroo offers a personal current account with overdraft facilities. This is a mobile bank account delivered via a banking app that enables customers to set up social groups of friends, flat mates, colleagues, family etc and split bills and settle directly with each other. It will soon offer personal loans and savings products.

### *Information that you provide voluntarily*

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

<b>Types of personal information</b>	<b>Why we collect it</b>
Name and contact details such as address, telephone number and email	For the purpose of processing applications for banking products and services, including ID, address, fraud and credit checks. We may also use some of your data to : <ul style="list-style-type: none"><li>(a) create a waiting list of customers who will shortly be invited to apply for a new product;</li><li>(b) provide those products and services to you and to communicate with you in connection with those products; and</li><li>(c) contact you to ask if you would be willing to participate in market research.</li></ul>

<b>Types of personal information</b>	<b>Why we collect it</b>
Personal data you may provide in communications	Where we are communicating with you, whether via the banking app or otherwise, you may provide personal data, for example in connection with an enquiry or complaint.
Age	To verify we are legally permitted to provide banking products and services to you.
Information such as copies of passports, driving licences, or other government-issued IDs, passport numbers, proof of address documents, signatures, tax identification numbers and utility bills and other evidence of transactions.	For identification purposes and to prevent fraud in connection with accounts and to comply with anti-money laundering requirements and tax reporting requirements.
Biometric information, such as face recognition	To identify individuals applying for accounts and other services and match their face with their ID documents. Also to identify fraud attempts and prevent an individual opening multiple accounts under different names.

We may also use all or some of the personal data you give us to analyse our customer base, for example to look at the age profile of customers and applicants. More generally we will use the information to administer the services you have requested.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

*Information that we collect automatically*

When you use a mobile phone or other similar electronic device to access our products and services, we may also collect certain information automatically from your device. This will include your IP address.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including credit reference agencies, World Checking services, CIFAS (a UK fraud prevention organisation that manages the National Fraud Database), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

**Information we collect from third parties**

<b>Types of personal information</b>	<b>Why we collect it</b>
Criminal records and proceedings checks, immigration status checks and World Checking searches	To comply with anti-money laundering and other account opening and maintenance requirements
Account and loans information	To provide our products and services to you, for internal analytics and credit portfolio management and for the purpose of detection and prevention of fraud
Information to check creditworthiness such as financial history, income and outgoings, credit history and court judgements	To carry out checks to assess creditworthiness for credit facilities you have applied for, for internal analytics and credit portfolio management
An indicative credit score for you - we obtain this from one or more credit reference agencies.	To provide you with a service. This information is only held if you have requested our Credit Score Monitoring Service. Also used to let you know about our own credit products from time to time.
Information about claims and proceedings (or potential claims and proceedings) by or against you	To identify, exercise and defend contractual and other legal rights

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

## Who does Kroo share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to one or more credit reference agencies, to inform them that you have a current account and to tell them about any credit you have with Kroo and your repayment record. Equifax, Experian and TransUnion (previously CallCredit), the ICO and major financial services trade associations, have developed a common statement, Credit Reference Agency Information Notice (CRAIN), defining the standards that all three Credit Reference Agencies will apply across all products and services in relation to processing consumer data. This can be found: <https://www.transunion.co.uk/legal/privacy-centre#pc-credit-reference>, <https://www.gbqplc.com/products-services-privacy-policy>, <https://www.equifax.co.uk/crain/>, <https://www.experian.co.uk/legal/crain/>. When we carry out such credit searches, these agencies will record details of that search, this is known as a search footprint. These searches can be carried out for several reasons. These include assessing creditworthiness and ability to afford financial products, checking the accuracy of other information, preventing and detecting crime (such as fraud or money laundering), checking identity or tracing individuals (for example to recover debts that they owe).
- The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found via the following link <https://www.cifas.org.uk/fpn>
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a

matter of applicable law or regulation including anti-bribery and corruption regulations and anti-money laundering laws, (ii) to exercise, establish or defend our legal rights, (iii) for fraud prevention purposes and (iv) to protect your vital interests or those of any other person;

- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- with **other banks that participate in Pay.UK's Confirmation of Payee service (CoP)**. If a person wants to make a payment to your Kroo current account from a bank in the UK and their bank participates in CoP, we will confirm whether the sort code and account number they propose to pay match the name of the person they state they intend to pay. This service is designed to reduce fraud or payments accidentally being sent to the wrong account. In certain limited circumstances it is possible for the customer to opt out of this service.
- to any **other person with your consent** to the disclosure.

## Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or from third parties (such as to comply with anti-money laundering or immigration laws and fraud prevention) or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at the end of this Privacy Notice.

## **How does Kroo keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include:

- physical access control systems
- a physical security presence
- logical access controls (such as passwords)
- perimeter security systems (such as firewalls)
- vulnerability management

## **International data transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which it was originally collected and other than the one in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our servers are hosted by AWS in Ireland. Our third party service providers and partners operate around the world. This means that when we collect your personal information we or our data processors may process it outside the UK or the European Economic Area (EEA). When we export your personal data we will take the necessary steps to ensure your data receives the same level of protection as afforded under relevant UK data protection legislation.

## **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will

securely store your personal information and isolate it from any further processing until deletion is possible.

## Automated decision-making

Automated decisions are decisions concerning you which are made automatically by a computer using software algorithms, without human review. We do not use automated decision-making except:

- Face recognition technology which matches an image that you provide us of your face with the photograph on ID documents that you provide us with when you apply to open an account with us. If there is no match the application will be declined.
- AI-based technology that assesses the genuineness of documents you provide us, such as evidence of proof of address. If the documents support an application for services and are not to be genuine the application will be declined.
- When you apply to open an account we run your details through fraud databases provided by external agencies. If there is a match your application will be declined.
- When you apply to borrow from us we will obtain information from credit reference agencies and use that, in combination with other information you have given us or which we hold because you are already a customer, to provide a credit score which will determine whether we can lend to you. If you are declined credit you have the right to ask for this decision to be reviewed.

## Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided at the end of this Privacy Notice.
- In addition, if you are a resident of the United Kingdom or the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details at the end of this Privacy Notice.
- You have the right to **opt-out of marketing communications** we send you at any time by contacting us using the contact details at the end of this Privacy Notice.



## EXTERNAL DOCUMENT

- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact the UK's Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### **Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the date displayed at the top of this Privacy Notice.

### **How to contact us**

If you have any questions or concerns about our use of your personal information, please contact our Data Protection Officer using the following details:  
dataprotection@Kroo.com.